

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

KIMBERLY STARLING, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

NEWSMAX MEDIA, INC.,

Defendant.

Case No. 4:24-cv-00797-O

JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER

Plaintiff Kimberly Starling and Defendant Newsmax Media, Inc. (together, “the Parties”) submit this Joint Motion for Entry of Protective Order requesting that the Court enter the Northern District of Texas’s standard Protective Order, with minor additions, in the form of the attached Exhibit “A.”¹ In support of this Joint Motion, the Parties state as follows:

1. The Parties are engaging in discovery, including the exchange of documents.
2. The Parties believe that certain information that is or will be encompassed by the Parties’ respective discovery requests in the litigation involves the production or disclosure of trade secrets, confidential business information, other proprietary information, or information of a personal and sensitive nature.
3. The Parties believe that the entry of the attached Protective Order will protect the confidentiality of any confidential and proprietary information.
4. The Parties believe that they have a legitimate business interest in keeping such information confidential.

¹ A redlined copy of the Northern District of Texas standard Protective Order showing the proposed additions is attached hereto as Exhibit “B.”

5. The Parties have agreed to the contents of the Protective Order, attached hereto as Exhibit A to this Joint Motion.

Therefore, the Parties respectfully request the Court enter the attached Protective Order.

Dated: November 12, 2024

**WE SO MOVE
and agree to abide by the
terms of the Protective Order**

/s/ Anthony I. Paronich

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Attorneys for Plaintiff

**WE SO MOVE
and agree to abide by the
terms of the Protective Order**

/s/ Daniel S. Blynn

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on November 12, 2024, a copy of the foregoing document was electronically filed with the Clerk of the Court and served on all counsel of record via the CM/ECF system.

/s/ Daniel S. Blynn

Daniel S. Blynn